

RESPONSE UNDER 37 C.F.R. § 1.111
USSN: 10/090,819

Q68804

The Schiller application can be antedated by perfecting the claim to foreign priority. Therefore, the rejections based on Schiller should be withdrawn. The filing date of the Schiller application is **June 29, 2001**, which is **after** the application's foreign priority date of **March 19, 2001**. A verified English translation of the priority document is being submitted with this Response.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



Carl J. Pellegrini
Registration No. 40,766

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE

23373

CUSTOMER NUMBER

Date: October 20, 2004